

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

J.H., by and through his next friend,)	
Terina Gray, on behalf of himself)	
and all persons similarly situated; T.A.,)	
by and through his next friend,)	
Alice Austin, on behalf of himself and)	
all persons similarly situated; and)	
DISABILITY RIGHTS MISSISSIPPI,)	
)	
)	
Plaintiffs,)	
v.)	
)	
HINDS COUNTY, MISSISSIPPI,)	
)	
Defendant.)	
)	

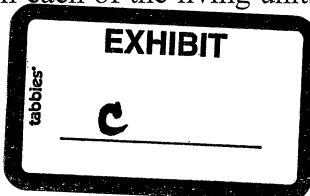
Case No. 3:11-CV-327 DPJ-FKB

DECLARATION OF MONIQUE GILLUM

I, **MONIQUE GILLUM**, state that the following is true and correct to the best of my knowledge:

1. I have been employed with the Southern Poverty Law Center as a Youth Advocate since September 15, 2010.

2. Pursuant to the Southern Poverty Law Center's contract with Disability Rights Mississippi, and the Joint Settlement Agreement negotiated by the parties and approved by the Court. Settlement Agreement, *E.W. v. Lauderdale County*, No. 4:09-cv-137 (S.D. Miss. June 2, 2010), ECF No. 21-1. *See also* Order Granting Approval of Settlement Agreement and Dismissing Case Without Prejudice, *E.W. v. Lauderdale County*, No. 4:09-cv-137 (S.D. Miss. June 3, 2010), ECF No. 22. I have been monitoring the Lauderdale County Juvenile Detention Center for the past nine months. During each visit, I make announcements on each of the living units to all youth, explaining the purpose of the



Protection and Advocacy system and the reason for my visit to the facility. After my announcement, youth have the opportunity to speak with me confidentially.

3. Prior to any interview, youth are informed of their right to refuse to speak with me and the right to terminate the interview at any time. I respect any youth's request not to speak with me or to terminate an interview.

4. The purpose of these interviews is to determine which children have disabilities and are eligible for P&A services, and to find out if any child with a disability has been subject to abuse or neglect. I only speak with youth who are determined to be eligible for P&A services following the initial interview as part of our monitoring activities.

5. If known, sometimes the Lauderdale County Juvenile Detention Center provides information that identifies youth who have a disability. However, the Lauderdale County Juvenile Detention Center does not limit the youth I am permitted to interview based on the information the facility provides.

/s/ Monique Gillum
MONIQUE GILLUM